

Dallas A. Verble  
Provence, Tiffany N v. United States of America, et al

February 9, 2022

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION  
IN ADMIRALTY

TIFFANY N. PROVENCE, AS THE PERSONAL REPRESENTATIVE  
OF THE ESTATE OF JUAN ANTONIO VILLALOBOS HERNANDEZ,

Plaintiff,

vs.

CASE NO. 2:21-cv-965-RMG

UNITED STATES OF AMERICA,  
CROWLEY MARITIME CORPORATION,  
CROWLEY GOVERNMENT SERVICES, INC.,  
DETYENS SHIPYARD, INC. AND  
HIGHTRAK STAFFING, INC. D/B/A  
HITRAK STAFFING, INC.,  
Defendants.

30(b)(6)

DEPOSITION OF: DETYENS SHIPYARD, INC.  
BY: DALLAS A. VERBLE

DATE: February 9, 2022

TIME: 10:04 AM

LOCATION: Detyens Shipyards, Inc.  
1670 Dry Dock Avenue, Suite 200  
Building 236  
North Charleston, SC

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: TERRI L. BRUSSEAU

1 30(b)(6) Deposition of Defendant Detyens Shipyards,  
2 Inc., was marked for identification.)

3 BY MR. YOUNG:

4 Q. Mr. Verble, have a look at that and let  
5 me ask you. Exhibit Number 1 is a copy of the  
6 notice for your deposition today. Have you seen  
7 that before today?

8 A. I don't think I've gotten the notice,  
9 uh-uh.

10 Q. Okay. Well, if you flip through it  
11 down on maybe the third page, there's a number of  
12 different topics there. Do you see that?

13 A. No, I haven't seen this.

14 Q. Okay. You've never seen Exhibit Number  
15 1, is that right?

16 A. Right.

17 Q. Okay. Tell us a little bit about what  
18 your job is at Detyens Shipyard. What do you do  
19 there? What's your title?

20 A. I'm a project manager. What I do when  
21 we get contracted a job, then I'm responsible to  
22 make sure that the job gets done in the -- on the  
23 schedule.

24 Q. Yes, sir.

25 A. And that the budget is done in the

1 killed?

2 A. I wasn't involved with the contract to  
3 bring the job here.

4 Q. Yes, sir.

5 A. I was involved with the job once we  
6 were awarded the job and it was assigned to Detyens  
7 and it come, then I started managing that.

8 Q. Okay. So let me make sure I have that,  
9 understand that correctly. You didn't actually  
10 participate in the negotiation of the contract with  
11 Crowley Maritime --

12 A. No.

13 Q. -- or Crowley Government Service or  
14 anything like that, is that right?

15 A. No, sir.

16 Q. Okay. But once the contract was signed  
17 and engaged, someone provided it to you and then  
18 you become the Detyens representative as project  
19 manager?

20 A. Yes, sir.

21 Q. All right. And then tell us a little  
22 bit about what you would do once that assignment is  
23 given to you, you're now project manager on the  
24 Detyens side of this 14 million dollar repair  
25 contract.

1 shop?

2 A. In this particular situation, they were  
3 installed by the electric shop with a gun that uses  
4 a 22 bullet to penetrate the stud into the metal.

5 Q. Okay. Let's look at Exhibit 3. This  
6 is the lifeboat davit repair specification from  
7 Crowley Government Services?

8 A. Yes, sir.

9 Q. And you testified that there is no  
10 specific instruction on how the davit arms are to  
11 be restrained, correct?

12 A. Yes, sir.

13 Q. Is that common in your experience?

14 A. Yes, sir, that's common.

15 Q. Okay. You did not -- when you reviewed  
16 this spec in order to budget the labor and  
17 materials for the job, did you find the  
18 specification to be deficient because it did not  
19 contain a specific instruction on how to restrain  
20 the davit arms?

21 A. I did not.

22 Q. You did not. Okay. You mentioned that  
23 the davit arms are restrained differently today by  
24 welding the angle iron across the tracks for the  
25 davit arms, correct?

1 A. That's correct.

2 Q. All right. And in the gravity davit  
3 repairs that are ongoing today or since the  
4 incident, is the means of restraint specified in  
5 the repair specification by the customer?

6 A. The new specifications?

7 Q. When you get repair specs from  
8 customers -- in other words, is that new method of  
9 restraint --

10 A. No, sir.

11 Q. It's not in the specification?

12 A. Not that I'm aware of. I'm not working  
13 a job right now where I have a davit job like that.  
14 I have not seen one yet that specifies how to.

15 Q. Okay. And presumably you have worked  
16 davit repair jobs or the shipyard has since this  
17 incident occurred --

18 A. Yes, sir.

19 Q. -- on other ships?

20 A. Yes, sir.

21 Q. And did those specifications contain an  
22 instruction on how to restrain the davit arm?

23 A. I don't recall any, no, sir.

24 Q. You don't recall that --

25 A. No, sir.

1 Q. -- existing?

2 A. No, sir.

3 Q. Okay. And do you expect the customer  
4 to tell the shipyard how to restrain the davit arm?

5 A. I don't expect, no.

6 Q. Okay. And that's something that's  
7 handled by the rigging shop?

8 A. Handled by the rigging shop and  
9 customary, the standard way we've done it for all  
10 along.

11 Q. Okay. Do you have any idea how long  
12 Detyens has prior to this incident restrained davit  
13 arms with this wire rope and Crosby clamps method?

14 A. I don't know for how long. I can tell  
15 you I've been here for 23 years and it's the way  
16 that it's been done since I've been here.

17 Q. Okay. All right. And has any customer  
18 ever in your 23 years in the past objected to the  
19 way it was done?

20 A. No, sir.

21 Q. Okay. And do you know how it's done or  
22 how it was done at other shipyards?

23 A. I do not know. It's the only shipyard  
24 I ever worked in.

25 Q. Okay. Fair enough. I just have to